

\$400.00  
CDJ

**JACK M. BERNARD, ESQUIRE**

Attorney ID No. 26643  
930 Land Title Building  
100 South Broad Street  
Philadelphia, PA 19110  
(215) 665-0666 (Phone)  
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*Attorney for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

**DRISSA KONE**

6423 Dicks Avenue  
Philadelphia, PA 19142  
and

**ANYAMA TRUCKING INC.**

1010 Serrill Avenue  
Yeadon, PA 19050

Plaintiffs,

vs.

**IKEA, IKEA DISTRIBUTION  
SERVICES, INC.**

100 Ikea Drive  
Westampton, NJ 08060-5112  
and

**BNSF LOGISTICS, LLC**

4700 S. Thompson Street  
Springdale, AZ 72764

Defendants

No.

14 00 113

**COMPLAINT**

**I.**

**JURISDICTION AND VENUE**

1. Plaintiff, Drissa Kone, is a citizen of the Commonwealth of Pennsylvania.

Plaintiff, Anyama Trucking, Inc., is a corporation organized and existing pursuant to the

*JS*

Business Corporation Law of the Commonwealth of Pennsylvania, having its principal place of business in the Commonwealth of Pennsylvania.

2. Defendant, IKEA, is a business entity incorporated under various names, including IKEA Distribution Services, Inc., which is organized and incorporated pursuant to the laws of a State other than the Commonwealth of Pennsylvania, having its principal place of business in a State other than the Commonwealth of Pennsylvania.

3. Defendant, BNSF Logistics, LLC, is a limited liability company organized under the laws of a State other than the Commonwealth of Pennsylvania, having its principal place of business in a State other than the Commonwealth of Pennsylvania.

4. The amount in controversy exceeds the sum of Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. Venue lies in this District, in that one or more of the Defendants is subject to personal jurisdiction in this District.

## II.

### **IDENTITY OF THE PARTIES**

6. Anyama Trucking, Inc. (“Anyama”) provides trucking services, either directly or as a subcontractor. Anyama owns a tractor trailer licensed by the Commonwealth of Pennsylvania.

7. Drissa Kone (“Kone”) is the principal of Anyama, and holds a commercial operator’s license issued by the Commonwealth of Pennsylvania.

8. IKEA manufactures, imports, and delivers furniture to its various locations throughout the United States.

9. IKEA Distribution Services, Inc. (“Distribution”) owns and operates a warehouse and storage facility in Westampton, New Jersey.

10. BNSF Logistics, LLC (“BNSF”) is a freight broker with locations and offices throughout the United States.

### **III.**

#### **FACTUAL NARRATIVE**

11. On February 18, 2012, Anyama received a truckload of furniture from IKEA that was loaded in Anyama’s trailer by employees of Distribution and/or BNSF at IKEA’s storage facility in Westampton, New Jersey.

12. The furniture stored on pallets was carelessly and negligently placed on the right side of Anyama’s trailer. The weight of the furniture was declared to be 44,500 pounds. On information and belief, the weight was in excess of that amount. After loading the trailer, Defendants’ employees scaled the back blocking view of the placement of the load.

13. Kone was instructed to drive the truckload of furniture to a rail yard located in Langhorne, Pennsylvania en route to IKEA’s warehouse in Schaumburg, Illinois. A true copy of the bill of lading is attached hereto and marked as Exhibit “A.”

14. Kone operated the tractor-trailer for approximately one and one-half miles when it rolled over as a result of improper loading when Kone was attempting to enter I-295 northbound from Rancocas, New Jersey.

### **IV.**

#### **LIABILITY AND DAMAGES**

15. IKEA, Distribution and BNSF owed a duty to Kone to safely load the pallets of furniture so that the weight would be evenly distributed. Said Defendants knew, or should have

known, that loading the furniture entirely on one side of the trailer was dangerous and likely to cause rollover.

16. Said Defendants breached their duty of care as aforesaid, causing bodily injuries suffered by Kone, property damage, towing expense and cargo losses by Kone and Anyama when the load of furniture shifted from the right side to the driver's side causing rollover.

17. As a direct and proximate result thereof, Kone suffered severe injuries in and about his shoulders, arms, lower back and knees, some of which may be permanent, consisting in part of a herniated lumbar disc at L5-S1 and a bulging disc at L4-L5, radiating to both legs; loss of income; loss of wages; and medical expenses for diagnosis and treatment, as well as deprivation of social, recreational and leisure activities.

18. As a further direct and proximate result of Defendants' negligence, Kone and Anyama incurred damages totaling approximately \$46, 446.00 for damage to the tractor and trailer, towing expenses and a cargo loss claim made by Evans Delivery Company, Inc. against Plaintiffs.

**WHEREFORE**, Plaintiffs claim damages against Defendants individually, jointly and severally, in excess of the sum of Seventy-Five Thousand Dollars (\$75,000.00), interest and costs.

Date: Feb. 14, 2014

  
\_\_\_\_\_  
JACK M. BERNARD, ESQUIRE  
Attorney for Plaintiffs

**EXHIBIT “A”**

# STRAIGHT BILL OF LADING

Case 2:14-cv-00942-LAS Document 1 Filed 02/14/14 Page 6 of 9 G1628070

**BNSF Logistics, LLC**

SHORT FORM Not Negotiable

Date: **02/18/12**

(Name of Carrier)

(SCAC)

TO:

**IKEA CHICAGO - SCHAUMBURG**

1800 East McConner Parkway

Schaumburg 60173 US

FROM:

IKEA 061

New Jersey Distribution Center

100 IKEA Drive

Westampton, NJ 08060

ROUTE:

**210**

U.S. DOT Hazmat Reg. No.

XXXXXX

Vehicle Number

**JBHU246110**

| NO. SHIPPING UNIT  | O HM | Description of Articles, Special Marks, and Exceptions | Weight (Subject to Correction)  | Class or Rate | Charges (For Carrier Use Only) | Check Column |
|--|------|--|---|---------------|--------------------------------|--------------|
| 1  | T/L  | FURNITURE K.D # PALLETS                                | 44,500 lbs  | X             | X                              | X            |
| <b>Astro Route : 210T51-1</b><br><b>Astro Trip Id : 610068975</b><br><b>S Number : S988385</b><br><b>Pars :</b><br><b>Pick up Time : 02/18/12 11:30 PM</b><br><b>Drop off Time : 02/22/12 04:30 AM</b> |      |  | <b>Driver Time</b><br>Arrival Time: _____<br>Depart Time: _____<br>IKEA Signature: _____<br>Co-Worker Name: _____ |               |                                |              |
| <b>Questions/Comments - IKEA Traffic</b><br><b>609-261-1208 x 2375</b><br><b>Or Contact Your Driver Manager</b>  |      |  |   |               |                                |              |
| <b>SEAL # E3247742</b>   |      |  |   |               |                                |              |

MIT C.O.D. TO:  
ADDRESS:  
CITY:

STATE: ZIP:

COD AMT: \$

C.O.D. Fee:

PREPAID ☐

COLLECT ☐ \$

When the shipment moves between two ports by a carrier by water, the carrier requires that the bill of lading shall state whether it is "carrier's or shipper's weight". Where the rate is dependent on value, shippers are required to specify in writing the agreed declared value of the property. If the agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \_\_\_\_\_ per \_\_\_\_\_

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Total Charges: \$

**Freight Charges**

Freight Prepaid except when box at right is checked ☐

Check Box if charges to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages shown), marked, consigned, and destined as indicated above which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under this contract) agrees to carry to its usual place of delivery at said destination, if on its own road or its own water line, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained (as specified in Appendix B to Part 1035) which are hereby agreed to by the shipper and accepted for himself and his assigns.

It is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation PER:

Shipper: **IKEA Distribution Services**

Carrier:

Per:

Per:

Date:

Date:

Emergency Response Telephone Number

**(410) 642-2795**

MONITORED AT ALL TIMES THE HAZARDOUS MATERIAL IS IN TRANSPORTATION INCLUDING STORAGE INCIDENTAL TO TRANSPORTATION. (172.604)

Mark with "X" to designate Hazardous Material as defined in The Department of Transportation Regulations Governing Transportation of Hazardous Materials. The use of this column is optional and of designating hazardous materials on Bills of Ladings per Section 172.201 and 172.202(s) of the regulations governing the transportation of such materials.

## CIVIL COVER SHEET

The JS 44 civil cover sheet is to be filled out by the filer. The information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided in the Federal Rules of Civil Procedure. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of filing the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

## I. (a) PLAINTIFFS

DRISSA KONE  
6423 Dicks Avenue  
Philadelphia, PA 19142

ANYAMA TRUCKING, INC.  
100 South Broad Street  
Yeadon, PA 19050

(b) County of Residence of First Listed Plaintiff Philadelphia

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Jack M. Bernard, Esquire  
930 Land Title Building, 100 South Broad Street  
Philadelphia, PA 19110 (215) 665-0666

## DEFENDANTS

IKEA, IKEA DISTRIBUTION SVCS, INC. BNSF LOGISTICS, LLC  
100 Ikea Drive 4700 S. Thompson Street  
Westampton, NJ 08060-5112 Springdale, AZ 85364

County of Residence of First Listed Defendant Burlington

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT  | TORTS   | FORFEITURE/PENALTY   | BANKRUPTCY  | OTHER STATUTES  |  |
|---|---|--|---|---|--|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input checked="" type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><b>LABOR</b><br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><b>IMMIGRATION</b><br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 840 Trademark<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education  | <b>PRISONER PETITIONS</b><br><b>Habeas Corpus:</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement      |   |   |  |

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. §1332

Brief description of cause:  
Motor Vehicle Accident

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

## DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE  
02/14/2014

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

2014

MS

UNITED STATES DISTRICT COURT

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.**

Address of Plaintiff: **6423 Dicks Avenue, Philadelphia, PA 19142**

Address of Defendant: **100 Ikea Drive, Westampton, NJ 08060-5112**

Place of Accident, Incident or Transaction: **Entrance to I-295 Northbound from Rancocas, New Jersey**  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

UNKNOWN

Yes ☐ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

**A. Federal Question Cases:**

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(Please specify) \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☒ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify) \_\_\_\_\_
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases  
(Please specify) \_\_\_\_\_

**ARBITRATION CERTIFICATION**

(Check Appropriate Category)

I, \_\_\_\_\_, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_

Attorney-at-Law

**26643**

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 02/14/2014

Attorney-at-Law

**26643**

Attorney I.D.#



**CDJ**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

**DRISSA KONE and ANYAMA TRUCKING, INC.** :  
**Plaintiffs,** :

**CIVIL ACTION**

**v.** :

**IKEA, IKEA DISTRIBUTION SERVICES, INC.** :  
**and BNSF LOGISTICS, LLC,** :

**NO.**

**Defendants**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (x)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

2-14-14  
**Date**

*Jason M. Bernard*  
**Attorney-at-law**

**Attorney for Plaintiffs**

(215) 665-0666

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jbernard@verizon.net

**Telephone**

**FAX Number**

**E-Mail Address**